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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:)	
)	Case No. 17-19082(KCF)
JOHN M. PAOLINI)	
)	Chapter 13
MARY BETH PAOLINI)	
)	Hearing date: 7-26-17
)	
)	<u>OBJECTION TO CONFIRMATION</u>
)	

Credit Acceptance Corporation ("CAC"), a secured creditor of the debtor, objects to the debtor's plan for the following reasons:

- a. **PLAN SILENT:** Credit Acceptance holds a first purchase money security interest encumbering a 2009 HONDA CIVIC as a result of a retail installment contract executed by the debtor in connection with the purchase of the vehicle on 11-28-15, less than 910 days prior to filing. The plan is silent as to CAC and must be amended to state that CAC is unaffected by the plan, is being paid directly by the debtor and if the case completes before the retail installment contract is paid in full, the debt to CAC will not be discharged.

- b. **Proof of insurance:** CAC requests that the debtor provide it with proof that the vehicle is insured as required by 11 U.S.C. 1326(a)(4).
- c. **Lien retention:** Credit Acceptance must retain its lien on the vehicle after confirmation and the plan must so provide.

/s/ John R. Morton, Jr.
John R. Morton, Jr., attorney for
Credit Acceptance Corporation

Dated: 6-8-17